

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE:</b>	)	<b>Chapter 11</b>
	)	
<b>SOUTH HILLS OPERATIONS, LLC, et al.,</b>	)	<b>Case No. 24-21217-CMB</b>
	)	
<b>Debtors.</b>	)	<b>Jointly Administered</b>
	)	
	)	<b>Related to Docket No. 141</b>
	)	
<b>SOUTH HILLS OPERATIONS, LLC, et al.,</b>	)	
	)	
	)	
<b>Debtors,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>West Penn Power Company and Pennsylvania Power Company,</b>	)	
	)	
	)	
<b>Respondents.</b>	)	

**NOTICE OF WITHDRAWAL OF OBJECTION OF WEST PENN POWER  
COMPANY AND PENNSYLVANIA POWER COMPANY TO THE DEBTORS'  
EXPEDITED MOTION, PURSUANT TO SECTION 366 OF THE BANKRUPTCY  
CODE, FOR ENTRY OF INTEREIM AND FINAL ORDERS: (A) PROHIBITING  
UTILITIES FROM ALTERING, REFUSING OR DISCONTNUING SERVICES TO,  
OR DISCRIMINATING AGAINST, THE DEBTORS ON ACCOUNT OF  
PREPETITION INVOICES; (B) DETERMINING THAT THE UTILITIES ARE  
ADEQUATELY ASSURED FOR FUTURE PAYMENT; AND (C) ESTABLISHING  
PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ASSURANCE**

PLEASE TAKE NOTICE that West Penn Power Company and Pennsylvania Power Company, by counsel, hereby voluntarily withdraw, as settled, their *Objection of West Penn Power Company and Pennsylvania Power Company to the Debtors' Expedited Motion, Pursuant to Section 366 of the Bankruptcy Code, for Entry of Interim and Final Orders: (A) Prohibiting Utilities from Altering, Refusing or Discontinuing Services to, or Discriminating Against, the Debtors on Account of Prepetition Invoices; (B) Determining that the Utilities Are Adequately*

*Assured for Future Payment; and (C) Establishing Procedures for Determining Requests for Additional Assurance*, filed May 28, 2024 at Docket No. 141.

Dated: June 8, 2024

LAW FIRM OF RUSSELL R. JOHNSON III, PLC

/s/ Russell R. Johnson III

Russell R. Johnson III

Virginia State Bar No. 31468

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Western District of Pennsylvania since July 8, 2015

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